

**Amendment to the Claims:**

Please cancel claims 9, 11, 16, 35, and 37 without prejudice.

- Sub C1
1. (Currently amended) A method for processing receiving trading partner transactions comprising:

receiving at least one incoming transaction from at least one sending trading partner, wherein receiving at least one incoming transaction from at least one sending trading partner comprises receiving at least incoming transaction from at least one sending trading partner through an industry clearinghouse system;

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translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system;

reading additional information from an administration system in data communication with a computer system, wherein the additional information is read in response to receiving at least one incoming transaction from the at least one sending trading partner, and wherein the additional information is identified by at least one business rule;

generating at least one outgoing transaction in response to reading the additional information from the administration system; and

sending at least one outgoing transaction to at least one receiving trading partner.

2. (Previously amended) The method of claim 1, wherein at least one business rule comprises one or more keywords.

3. (Previously amended) The method of claim 1, wherein at least one business rule comprises one or more logical operators.
4. (Previously amended) The method of claim 1, wherein at least one business rule comprises a string of at least one keyword and at least one operator, and wherein at least one business rule is entered into a computer system by a user via a user interface.
5. (Previously amended) The method of claim 1, wherein at least one outgoing transaction comprises the additional information read from the administration system.
6. (Previously amended) The method of claim 1, wherein the reading additional information from the administration system in response to receiving at least one incoming transaction from the at least one sending trading partner further comprises: extracting the additional information from the administration system according to search criteria.
7. (Original) The method of claim 6, wherein the search criteria comprise one or more keywords.
8. (Previously amended) The method of claim 1, further comprising: queuing at least one outgoing transaction in response to generating at least one outgoing transaction.
9. (Cancelled)
10. (Previously amended) The method of claim 1, wherein sending at least one outgoing transaction to at least one receiving trading partner further comprises sending at least one outgoing transaction to at least one receiving trading partner through an industry clearinghouse system.
11. (Cancelled)

12. (Previously amended) The method of claim 1, wherein at least one incoming transaction is an insurance-related transaction.

Sub C1  
13. (Currently amended) A system comprising:

a CPU;

a database coupled to the CPU;

an administration system coupled to the CPU;

a memory coupled to the CPU, wherein the memory stores one or more computer programs executable by the CPU; wherein the computer programs are executable to:

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store a trading relationship between trading partners of a transaction, wherein the trading relationship is stored in the database, wherein at least one trading partner is a sending trading partner and at least one trading partner is a receiving trading partner;

receive at least one incoming transaction from the at least one sending trading partner, wherein at least one incoming transaction is received from at least one sending trading partner through an industry clearinghouse system;

translate at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system;

read additional information from the administration system in response to receiving at least one incoming transaction from at least one sending trading partner, wherein the additional information is identified by at least one business rule;

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generate at least one outgoing transaction in response to reading the additional information from the administration system;

send at least one outgoing transaction to at least one receiving trading partner, wherein at least one receiving trading partner is identified in the trading relationship.

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14. (Previously amended) The system of claim 13, wherein at least one business rule comprises a string of at least one keyword and at least one operator, and wherein at least one business rule is entered into a computer system by a user via a user interface.

15. (Previously amended) The system of claim 13, wherein at least one business rule is defined by a user through a user interface.

16. (Cancelled)

17. (Previously amended) The system of claim 13, wherein at least one incoming transaction is an insurance-related transaction.

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18. (Currently amended) A carrier medium, which stores program instructions, wherein the program instructions are executable by a computer system to implement the method of:

receiving at least one incoming transaction from at least one sending trading partner, wherein receiving at least one incoming transaction from at least one sending trading partner comprises receiving at least incoming transaction from at least one sending trading partner through an industry clearinghouse system;

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translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system;

reading additional information from an administration system in response to receiving the incoming transaction from the at least one sending trading partner, wherein the additional information is identified by at least one business rule;

generating at least one outgoing transaction in response to reading the additional information from the administration system,

sending at least one outgoing transaction to at least one receiving trading partner.

19. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises one or more keywords.

20. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises one or more logical operators.

21. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises a string of at least one keyword and at least one operator, and wherein at least one business rule is entered into the computer system by a user via a user interface.

22. (Previously amended) The carrier medium of claim 18, wherein at least one business rule is stored in a database.

23. (Previously amended) The carrier medium of claim 18, wherein the administration system from which additional information is read is specified by a map, wherein the map comprises a relationship between at least one outgoing transaction and a source for the additional information.

24. (Original) The carrier medium of claim 23, wherein the map is specified by a user through a user interface.

25. (Previously amended) The carrier medium of claim 23, wherein the program instructions are further executable by the computer system to implement generating the map, wherein generating the map comprises:

- selecting one or more source fields, wherein each source field corresponds to the source for the additional information;

- selecting a destination field, wherein each destination field corresponds to at least one outgoing transaction.

26. (Original) The carrier medium of claim 25, wherein a value of the destination field is a sum of respective values of the one or more selected source fields.

27. (Original) The carrier medium of claim 25, wherein the program instructions are further executable by the computer system to implement generating a value of the destination field as a function of the one or more source fields.

28. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction comprises the additional information read from the administration system.

29. (Previously amended) The carrier medium of claim 18, wherein the program instructions are further executable by the computer system to implement storing a schedule in memory, wherein the schedule relates to at least one incoming transaction, and wherein the schedule comprises a predetermined time for receiving at least one incoming transaction from the at least one sending trading partner.

30. (Previously amended) The carrier medium of claim 18, wherein the program instructions are further executable by the computer system to implement storing a schedule in memory, wherein

the schedule relates to at least one incoming transaction, and wherein the schedule comprises a predetermined time for reading the additional information from the administration system.

31. (Previously amended) The carrier medium of claim 18, wherein the program instructions are further executable by the computer system to implement storing a schedule in memory, wherein the schedule relates to at least one outgoing transaction, and wherein the schedule comprises a predetermined time for sending at least one outgoing transaction to the at least one receiving trading partner.

32. (Previously amended) The carrier medium of claim 18, wherein reading additional information from the administration system in response to receiving at least one incoming transaction from at least one sending trading partner further comprises extracting the additional information from the administration system according to search criteria.

33. (Original) The carrier medium of claim 32, wherein the search criteria comprise one or more keywords.

34. (Previously amended) The carrier medium of claim 18, wherein the program instructions are further executable by the computer system to implement queuing at least one outgoing transaction in response to generating at least one outgoing transaction.

35. (Cancelled)

36. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is sent to the at least one receiving trading partner through an industry clearinghouse.

37. (Cancelled)

38. (Previously amended) The carrier medium of claim 18, wherein at least one incoming transaction is an insurance-related transaction.

39. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is an insurance-related transaction.

40. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is an annuity asset pricing transaction.

41. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is a positions and valuation focused refresh transaction.

42. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is a positions and valuation full refresh transaction.

43. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is an insurance pricing transaction.

44. (Previously amended) The carrier medium of claim 18, wherein at least one outgoing transaction is a commission settlement transaction.

45. (Previously amended) The carrier medium of claim 18, wherein at least one sending trading partner is the receiving trading partner.

46. (Original) The carrier medium of claim 18, wherein the carrier medium is a memory medium.

47. (Currently amended) A carrier medium, which stores program instructions, wherein the program instructions are executable by a computer system to implement the method of:

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Claim 47



storing a trading relationship between trading partners of a transaction, wherein at least one trading partner is a sending trading partner and at least one trading partner is a receiving trading partner;

receiving at least one incoming transaction from at least one sending trading partner, wherein receiving at least one incoming transaction from at least one sending trading partner comprises receiving at least incoming transaction from at least one sending trading partner through an industry clearinghouse system;

translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system;

reading additional information from an administration system in response to receiving the incoming transaction from the at least one sending trading partner, wherein the additional information obtained is identified by at least one business rule;

generating at least one outgoing transaction in response to reading additional information from the administration system;

sending at least one outgoing transaction to the at least one receiving trading partner, wherein the at least one receiving trading partner is identified in the trading relationship.

48. (Previously amended) The carrier medium of claim 47, wherein at least one business rule comprises a string of at least one keyword and at least one operator, and wherein at least one business rule is entered into the computer system by a user via a user interface.

49. (Previously amended) The carrier medium of claim 47, wherein at least one business rule is stored in a database.

50. (Previously amended) The carrier medium of claim 47, wherein at least one outgoing transaction is an insurance-related transaction.

51. (Original) The carrier medium of claim 47, wherein the carrier medium is a memory medium.

52. (Previously amended) The method of claim 1, wherein at least one business rule comprises a receiving trading partner identifier.

53. (Previously amended) The method of claim 1, wherein at least one business rule comprises an administration system identifier.

54. (Previously amended) The method of claim 1, wherein at least one business rule comprises a transaction identifier.

55. (Previously amended) The method of claim 1, wherein at least one business rule comprises a transaction status.

56. (Previously amended) The method of claim 1, wherein at least one business rule comprises a sending trading partner identifier.

57. (Previously amended) The method of claim 1, wherein at least one business rule is entered into a database.

58. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises a receiving trading partner identifier.

59. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises an administration system identifier.

60. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises a transaction identifier.

61. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises a transaction status.

62. (Previously amended) The carrier medium of claim 18, wherein at least one business rule comprises a sending trading partner identifier.

63. (New) The method of claim 1, wherein the industry clearinghouse system comprises an insurance industry clearinghouse system.

64. (New) The method of claim 1, wherein the industry clearinghouse system comprises an insurance annuity clearinghouse system.

65. (New) The system of claim 13, wherein the industry clearinghouse system comprises an insurance industry clearinghouse system.

66. (New) The system of claim 13, wherein the industry clearinghouse system comprises an insurance annuity clearinghouse system.

67. (New) The carrier medium of claim 18, wherein the industry clearinghouse system comprises an insurance industry clearinghouse system.

68. (New) The carrier medium of claim 18, wherein the industry clearinghouse system comprises an insurance annuity clearinghouse system.

69. (New) The carrier medium of claim 47, wherein the industry clearinghouse system comprises an insurance industry clearinghouse system.

70. (New) The carrier medium of claim 47, wherein the industry clearinghouse system comprises an insurance annuity clearinghouse system.

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**Response to Office Action Mailed November 21, 2002**

**A. Claims in the Case**

Claims 1-62 have been rejected. Claims 1-70 are pending. Claims 1, 11, 13, 18, 37, and 47 have been amended. Claims 9, 11, 16, 35, and 37 have been cancelled. Claims 63-70 are new.

**B. The Claims Are Not Obvious Over Borghesi in View of Richards Under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 1-62 as being obvious over U.S. Patent Application No. 5,950,169 to Borghesi et al. (hereinafter "Borghesi") in view of Official Notice taken by the Examiner under 35 U.S.C. § 103(a). Examiner cited U.S. Patent Application No. 6,408,303 to Richards (hereinafter "Richards") to support the Official Notice. Applicant respectfully disagrees with these rejections.

In order to reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner* et al., 379 F.2d 1011, 154 U.S.P.Q. 173, 177-178 (C.C.P.A. 1967). To establish a *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP § 2143.03.

If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988), MPEP § 2143.03.

The Examiner states:

Borghesi does not teach translating at least one incoming transaction from a first data format to a second data format. Official notice is taken that translating incoming data from a first data format to a second data format is well known in the art.... Therefore, it would have been obvious to one with ordinary skill in the art at the time the invention was made to combine the feature above with Borghesi's for the purpose of time-consuming because the incoming data need not be re-entered to another data format compatible with the trading partner's internal data processing system.

Applicant respectfully traverses the assertion that translating at least one incoming transaction from a first data format to a second data format was old and well-known in the art at the time of the invention. Applicant believes MPEP 2144.03 will apply. Pursuant to MPEP 2144.03, Applicant respectfully requests the Examiner to provide support for his assertion either by an affidavit or by references brought to the Applicant's attention. Otherwise, Applicants request this rejection be removed. *See, e.g.*, MPEP 2143.01.

Applicant submits that the combination of Borghesi and the Official Notice given by the Examiner does not teach or suggest all the features of independent claims 1, 13, 18 and 47.

Amended claims 1, 18, and 47 describe a combination of features including but not limited to: "wherein receiving at least one incoming transaction from at least one sending trading partner comprises receiving at least incoming transaction from at least one sending trading partner through an industry clearinghouse system" and "translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system." Amended claim 13 describes a combination of features including but not limited to: "wherein at least one incoming transaction is received from at least one sending trading partner through an industry clearinghouse system" and "translate at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system."

Support for the above-mentioned features is found in Applicant's Specification.

Applicant's Specification states:

An incoming transaction may be received from the at least one sending partner as identified in a trading relationship. In one embodiment, the incoming transaction may be received through the Annuity Processing Service of the NSCC.

(Specification, page 3, lines 28-30)

Applicant's Specification further states in support of the above-mentioned amendment:

The trading partners and computer system for transaction processing are configured to exchange transaction data electronically with one another through the industry clearinghouse. The industry clearinghouse may require transaction data to be exchanged in a particular data format. For example, in one embodiment the industry clearinghouse is the Annuity Processing System (APS) or Insurance Processing System (IPS) of the National Securities Clearing Corporation (NSCC). In one embodiment, the computer system for transaction processing includes industry adapters to convert or translate incoming transaction data from NSCC data formats or other standard data formats and outgoing transaction data to NSCC data formats or other standard data formats. As used herein, an 'industry adapter' includes a computer program, utility, driver, or interface which translates or converts data to or from a standardized data format.

(Specification, page 8, line 24 to page 9, line 8)

The Examiner states: "Richards (US 6,408,303) discloses translating at least one incoming transaction from a first data format to a second data format (column 2, line 60-column 3, line 67)."

Richards states:

A system and method for building a trading partner profile for use with commercial translator software is disclosed. ... The commercial translator software uses the trading partner profile to complete the translation of the incoming file to a format for use by business or other applications.

(Richards, Abstract)

Richards also states:

The present invention automates the process of building a trading partner profile for use with commercial translator software. The present invention is particularly well suited for use by businesses that have many trading partners submitting few transactions. The present invention is cost-effective in any environment that relies on trading partner profiles for processing of EDI-based transactions because the process of building a trading partner profile is fully automated. Information regarding each trading partner for a business is stored in a trading partner profiles database so that a translator in accordance with the trading partner profile may process incoming transactions. Each trading partner profile is comprised of a plurality of fields or parameters that the translator uses in processing files or transactions from a particular trading partner. The present invention therefore automatically determines the values of the fields or parameters that the translator uses for processing. Although the structure of a trading partner profile varies based on the translator used by the business, some basic information is common to virtually all translators.

The present invention is comprised of several software components that operate in accordance with data stored in files, lists, tables, databases, etc. to provide the features and functionality described herein. Although the present invention is described in terms of multiple software components and information stores, it is understood that the features and functionality of the present invention could be provided in accordance with fewer or more components and/or information stores. A Determine File Type component examines an inbound or incoming file to determine its type. A Build Trading Partner Profile component extracts information from the incoming file and a list of file type/map associations to build a trading partner profile that is stored in a trading partner profile database. A Perform Translation component then extracts information from the trading partner profile database to complete the translation of the incoming file to a format for use by business or other applications.

To use the present invention, a business that would like to accept or receive files from various trading partners defines a list of file types that it is willing to accept. The files may be EDI standard or non-EDI files. As long as the business and trading partner have agreed on a file format, any type of file may be processed by the present invention. For each file type that the organization has determined it will accept or receive, the name of a map for the file type and an instruction for calling the translator with the map is further specified in the list. The file type, map name, and instruction information is preferably stored in a table or database. Information in an incoming file drives the process of building the trading partner profile so that it does not have to be created manually. The incoming file is examined to determine its type. After the file type is determined, a trading partner identifier is extracted from the incoming file. The trading partner identifier, preferably, identifies the trading partner profile within the trading partner profile database. If a profile for the trading partner exists, it is used by the



translator to complete the translation process. If a profile for the trading partner does not exist, it is built automatically as follows.

First, an entry in the trading partner profile database is created based on the trading partner identifier extracted or selected from the incoming file. Information regarding terminators and separators for the specific commercial translator in use by the business is added to the profile. The terminator and separator information typically is found in the incoming file and is located or selected based on the known or pre-defined structure of the file. Next, a map direction that identifies whether the transaction is inbound or outbound is located or selected and added to the profile. Also stored in the trading partner profile database is a production or test indicator that may be determined from the incoming file. Following completion of the trading partner profile, the translator completes translation of the incoming file based on information contained in the trading partner profile.

(Richards, column 2, line 60 - column 3, line 67)

Richards further states:

Referring to FIG. 1, a business that would like to accept or receive files from various trading partners defines a list of file types that it is willing to accept. For each file type that the organization has determined it will accept or receive, the name of a map for the file type and an instruction for calling the translator with the map is further specified in the list.

(Richards, column 4, lines 10-15)

Richards appears to teach building trading partner profiles for “a business that would like to accept and receive files from various trading partners” without the use of an intermediary. Richards appear to teach that the trading partner profiles enable a trading partner to translate files from the various trading partners. Amended claims 1, 18, and 47 describe the features of including but not limited to “translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system.” Amended claim 13 describes the features of including but not limited to “translate at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system.”

An industry clearinghouse refers to an entity that acts as an intermediary (e.g., APS clearinghouse) between trading partners that provides “a flexible system for the transmission of

information to and from trading partners such as insurance carriers, broker/dealers, agents, banks, and other organizations.” (Specification, page 2, lines 1-3) An industry clearinghouse, such as APS, includes multiple “trading partners who are members.” (Specification, page 2, lines 4-5). Richards does not appear to teach or suggest translating or receiving files from an industry clearinghouse system.

**B. The Claims Are Not Obvious Over Borghesi in View of Berman Under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 1-62 as being obvious over U.S. Patent Application No. 5,950,169 to Borghesi et al. in view of Official Notice taken by the Examiner under 35 U.S.C. § 103(a). Examiner cited U.S. Patent Application No. 5,995,939 to Berman et al. (hereinafter “Berman”) to support the Official Notice. Applicant respectfully disagrees with these rejections.

The Examiner states: “Berman et al. (US 5,995,939) discloses translating at least one incoming transaction from a first data format to a second data format (column 8, line 57-column 9, line 23 and column 14, lines 35-45).

Berman states:

The automated networked service request and fulfillment system described herein also includes a "universal interface" software component 290, typically stored on the client system's data storage medium 24 (identified in FIG. 1), which provides a solution to the problems encountered as a result of the myriad of database record formats presently in use in professional offices. In the past, converting these existing, "legacy" database records into the record and database format used by a new office management software package required hours of manual data re-entering. The universal interface program provides an automated method of importing the legacy data records, converting them into the record format used and needed by the client software 28, and storing the converted records into a new database. This process normally need only be performed once, when the automated networked service request and fulfillment system is first incorporated into an office. Once all the legacy records have been converted and

stored into a new database, all new records are entered directly into the new database.

(Berman, column 8, line 57 to column 9, line 3)

Berman appears to teach translating or converting existing database records from one format to another on the same storage medium. Berman does not appear to teach or suggest translating files received from a sending trading partner or an industrial clearinghouse system. Therefore, Berman does not appear to teach or suggest translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system.

**C. The Claims Are Not Obvious Over Borghesi in View of Spurgeon Under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 1-62 as being obvious over U.S. Patent Application No. 5,950,169 to Borghesi in view of Official Notice taken by the Examiner under 35 U.S.C. § 103(a). Examiner cited U.S. Patent Application No. 6,088,677 to Spurgeon (hereinafter “Spurgeon”) to support the Official Notice. Applicant respectfully disagrees with these rejections.

The Examiner states: “Spurgeon (US 6,088,677) discloses translating at least one incoming transaction from a first data format to a second data format.”

Spurgeon states:

An information-exchange system is provided for controlling the exchange of business and clinical information between an insurer and multiple health care providers. The system includes an information-exchange computer that is connected over a local area network to an insurer computer using a proprietary database and over the Internet to health-care provider computers using open database-compliant databases. The information-exchange computer receives subscriber insurance data from the insurance computer database, translates the insurance data into an exchange database, and pushes the subscriber insurance

data out over the Internet to the computer operated by the health-care provider assigned to each subscriber.  
(Spurgeon, Abstract)

Spurgeon appears to teach a system for exchanging information between an insurer and multiple healthcare providers. Spurgeon appears to teach a system that translates data from an insurer for use by multiple healthcare providers. Spurgeon does not appear to teach or suggest the use of an industry clearinghouse system. Spurgeon does not appear to teach or suggest at least the combination of features including but not limited to translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system.

**D. The Claims Are Not Obvious Over Borghesi in View of Boyer Under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 1-62 as being obvious over U.S. Patent Application No. 5,950,169 to Borghesi in view of Official Notice taken by the Examiner under 35 U.S.C. § 103(a). Examiner cited U.S. Patent Application No. 6,208,973 to Boyer et al. (hereinafter “Boyer”) to support the Official Notice. Applicant respectfully disagrees with these rejections.

The Examiner states: “Boyer et al. (US 6,208,973) discloses translating at least one incoming transaction from a first data format to a second data format (column 1, lines 49-55).”

Boyer states:

In conventional automated third party payor systems in the healthcare industry, the claim for payment is generated by the administrative staff of the healthcare provider or healthcare maintenance organization and transmitted electronically to a clearinghouse that accepts the electronic transmission, edits and processes the transmission, and reroutes and sends the claim electronically to the appropriate third party payors. In the health insurance industry, intermediaries receive claims from healthcare providers or other claimants, edit the claims data for validity and accuracy, translate the data from a given format into one

acceptable to the intended third party payor (e.g., insurance company), and forward the processed claim to the appropriate third party payor. (Boyer, column 1, lines 42-55)

Boyer appears to teach a clearinghouse that receives a claim for payment from a healthcare provider, processes the claim, and translates the claim to a format appropriate for a third party payor. Boyer appears to teach a payor (i.e., a receiving trading partner) receiving an incoming transaction from a healthcare provider (i.e., a sending trading partner) through a clearinghouse. Boyer does not appear to teach the features of amended claims 1, 13, 18, and 47 including but not limited to a receiving trading partner (e.g., a payor) “translating” (or “translate”) “at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system. Boyer teaches that the clearinghouse translates an incoming transaction (claim for payment) to the data format of the payor (receiving trading partner), so that the payor does not have to translate the transaction.

Thus, the combination of Borghesi and Boyer does not appear to teach or suggest such combination of features of amended claims 1, 18, and 46 including but not limited to the features of translating at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system. In addition, the combination of Borghesi and Boyer does not appear to teach or suggest such combination of features of amended claim 13 including but not limited to the features of translate at least one incoming transaction from a first data format to a second data format, wherein the first data format comprises a data format of an industry clearinghouse system.

#### **E. Summary**

Based on the above, Applicant submits that all of the claims are now in condition for allowance. Favorable reconsideration is respectfully requested.